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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

In re Google Play Store Antitrust Litigation

This document relates to:

Epic Games, Inc. v. Google LLC, et al.,
Case No. 3:20-cv-05671-JD

CASE NO. 21-md-02981-JD

[PROPOSED] ORDER

The Honorable James Donato

Pursuant to Civil Local Rule 79-5 and this Court's Standing Order, counsel for non-party Apple Inc. ("Apple") filed a Motion to Seal Portions of Trial Exhibits 1492, 1493, and 6190 (the "Motion"). The Court having considered the Motion, the Declaration of Jason C. Lo (Lo Decl.), all other associated papers, and any argument of counsel, and for good cause appearing:

IT IS HEREBY ORDERED that the Motion, is **GRANTED**. Accordingly,

(1) The unredacted versions of the admitted Trial Exhibits 1492, 1493, and 6190 sought to be sealed by the Motion are entitled to protection under the law and shall remain under seal;

(2) The public shall have access to only the versions of the admitted Trial Exhibit 1492, 1493, and 6190 sought to be sealed by the Motion and in which the following portions in the below chart have been redacted:

Exhibit Number (Trial Exhibit No.)	Description or Pages & Lines	Reason for Redaction	Order
Trial Exhibit 1492 (GOOG-PLAY2-000455423	2016 Amendment to the Information Services Agreement between Apple and Google <ul style="list-style-type: none"> GOOG-PLAY2-000455423 description of permissible uses under "(a) Safari (Web Browser Software)"; GOOG-PLAY2-000455423 definition of term following "Default"; -GOOG-PLAY2-000455429 information in the paragraph continued from previous (not excerpted) page; GOOG-PLAY2-000455429 information in the paragraph following "Annual CEO-Check-In"; GOOG-PLAY2-000455429-GOOG-PLAY2-000455430 information under "6. Limitation of Liability"; 	<u>Apple sealing request:</u> This document should be partially sealed because it contains Apple's competitively sensitive information which if revealed would put Apple at a competitive disadvantage in the marketplace and could be unfairly leveraged in future negotiations by Apple's business partners other than Google. None of this information is relevant to this action, nor was any of it discussed in trial testimony.	

	as highlighted (Declaration of Jason C. Lo (“Lo Decl.”), Ex. A).		
Trial Exhibit 1493 (GOOG-PLAY-007036302)	<p>Internal Briefing re: Apple Partnership Strategy</p> <ul style="list-style-type: none"> • GOOG-PLAY-007036303 information related to the bullet “Messaging Interoperability”; • GOOG-PLAY-007036304 information in the sub-bullet under “GCP Commitment”; • GOOG-PLAY-007036305 information in row 1 of the Relationship Map related to “Comms”; • GOOG-PLAY-007036305 information in row 1 of the Relationship Map related to “Ads (GCAS)”; • GOOG-PLAY-007036305 information in row 5 of the Relationship Map related to “Corp Eng”; • GOOG-PLAY-007036305 information in row 6 of the Relationship Map related to “Cloud”; • GOOG-PLAY-007036305 information in row 1 of the Relationship Map related to “Comms”; <p>as highlighted (Lo Decl. Ex. B)</p>	<p><u>Apple sealing request:</u> This document should be partially sealed because it contains Apple’s competitively sensitive information which if revealed would put Apple at a competitive disadvantage in the marketplace and could be unfairly leveraged in future negotiations by Apple’s business partners other than Google. None of this information is relevant to this action, nor was any of it discussed in trial testimony.</p>	
Trial Exhibit 6190 (GOOG-PLAY-0081462814.R)	<p>December 20, 2018 Email</p> <ul style="list-style-type: none"> • GOOG-PLAY-008146282.R information in the first paragraph (continuing from previous page) in the last full line after the word “underperform” and before the words “on iPad”; • GOOG-PLAY-008146282.R at the 	<p><u>Apple sealing request:</u> This document should be partially sealed because it contains Apple’s competitively sensitive information which if revealed would put Apple at a competitive disadvantage in the marketplace and could be unfairly leveraged in future negotiations by Apple’s business partners other than</p>	

	seventh bullet under the “Notes” section immediately before “Safari suggestions” as highlighted (Lo Decl. Ex. C)	Google. None of this information is relevant to this action, nor was any of it discussed in trial testimony.	
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IT IS SO ORDERED.

DATED: _____

HONORABLE JAMES DONATO
UNITED STATES DISTRICT COURT JUDGE